

To: The Federal Communications Commission

From: Radio Free Moscow, Inc.

RE: Docket MM 99-325 (IBOC Digitalization)

Radio Free Moscow, Inc. is a current applicant for a Low Power FM radio station license.

We are filing these Reply Comments in support of THE VIRGINIA CENTER FOR THE PUBLIC PRESS. Like them, and others, we are opposed to implementation of In Band On Channel (IBOC) Digitalization.

We are concerned that IBOC Digital radio will hurt reception of our signal on the channel we applied for. We are also concerned that the variety of programming available on the FM band from any one location will diminish as stations adopt IBOC, interfering with adjacent channels. This will cause listeners to lose interest in listening to FM.

We are also concerned that if IBOC Digitalization becomes mandatory, we won't be able to afford the cost of converting the station to IBOC, and even if we come up with the money, our listeners may not be able to afford digital radios. If IBOC conversion is mandatory, the approximately half billion AM/FM radios in the US will become useless.

We urge the Commission to proceed with the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Even then, of course, the Eureka-147 technology should first be tested and evaluated as thoroughly as the IBOC technology has been.

In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology.

Sincerely, Leigh Robartes